

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA

VS.

BRENDA FUENTES

§
§
§
§
§

CR. NO. 7:19-CR-02341

**DEFENDANT’S
“UNOPPOSED”
MOTION FOR CONTINUANCE OF
PRE-TRIAL & JURY SELECTION DATES
OUT OF TIME**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES BRENDA FUENTES, defendant in the above entitled and numbered cause, by and through her attorney **RUDY MORENO**, and respectfully moves the Court to reset the Pre-Trial and Jury Selection dates in this cause and would show the Court as follows:

I.

This case is presently set for Pre-Trial on April 1, 2020 at 9:00 a.m., and Jury Selection on April 7, 2020, at 9:00 a.m., before this Honorable Court.

II.

Defendant’s counsel is respectfully requesting a continuance of the pre-trial and jury selection dates. The undersign counsel ask the Court to consider the current guidelines from the Center of Disease Control and Public Health authorities that have been put in place to reduce or avoid exposure to the COVID-19 virus, as well as Hidalgo County’s Declaration of Local Disaster / Shelter in Place Order, and therefor respectfully request a sixty (60) day continuance.

Defendant is currently out on bond in this matter.

III.

AUSA Amy Lynn Greenbaum is “Unopposed” to the Court granting Defendant’s request.

IV.

This Motion is not made for purposes of delay but only to protect the health and well-being of Defendant and the general public.

WHEREFORE, PREMISES CONSIDERED, Defendant prays unto the Court this Motion for Continuance be granted and the present Pre-trial and Jury Selection dates be re-set as respectfully requested.

Respectfully Submitted,

/S/RUDY MORENO

RUDY MORENO

State Bar No. 24102807

Federal I.D. No. 3102324

LAW OFFICES OF RUDY MORENO

5526 North 10th Street

McAllen, Texas 78504

(956) 682-9477 Telephone

(956) 682-0223 Facsimile

CERTIFICATE OF SERVICE

I hereby certify that on this the 26th day of March, 2020, I filed a Motion to Continue the Pre-Trial and Trial dates with the Clerk of the Court & provided a copy of such filing to all counsel of record.

/S/RUDY MORENO

RUDY MORENO

CERTIFICATE OF CONFERENCE

I hereby certify that I have spoken with the AUSA Amy Lynn Greenbaum in reference to Defendant **BRENDA FUENTES'** Motion for Continuance and she is unopposed.

/S/RUDY MORENO
RUDY MORENO